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FILED (DROP BOX)

MAR 05 2021

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY 

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

21-CV-299 JLP

James A. Lawrence Jr.

CASE NO. _____
[to be filled in by Clerk's Office]

COMPLAINT FOR EMPLOYMENT
DISCRIMINATION

Plaintiff(s),

v.

Jury Trial: ☐ Yes ☒ No

Star Protection Agency LLC

Defendant(s).

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	James A. Lawrence Jr.
Street Address	450 Central Way Unit 3203
City and County	Kirkland, KING
State and Zip Code	WA 98033
Telephone Number	(425) 652-8401

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B. Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Star Protection Agency LLC
Job or Title (if known)	Private Entity
Street Address	875 124th Ave NE, Suite 101
City and County	Bellevue, KING
State and Zip Code	WA 98005-2531
Telephone Number	(425) 990-5400

Defendant No. 2

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

Defendant No. 3

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

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Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name

Star Protection Agency LLC

Street Address

875 124th Ave NE, Suite 101

City and County

Bellevue, KING

State and Zip Code

WA 98005-2531

Telephone Number

425) 990-5400

II. BASIS FOR JURISDICTION

This action is brought for discrimination in employment pursuant to (check all that apply):

☐

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

☐

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

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☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

☒ Other federal law (specify the federal law):

ADAAA of 2008, as codified, 42 U.S.C. §§ 12112 to 12117 (*Amended*)

☒ Relevant state law (specify, if known):

RCW 49.60 Washington Law Against Discrimination (WLAD)

☐ Relevant city or county law (specify, if known):

III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The Private Employer is in Violation for Failure to Accommodate,
Breach of Contract, Failure to engage in the Interactive Process,
Harassment on Basis of Disability

A. The discriminatory conduct of which I complain in this action includes (check all that apply):

- ☐ Failure to hire me.
- ☒ Termination of my employment.
- ☐ Failure to promote me.
- ☒ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.

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☐ Other acts (*specify*): _____

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
04/28/2019, 05/01/2019, 05/09/2019, 08/19/2019

C. I believe that defendant(s) (*check one*):

☐ is/are still committing these acts against me.

☒ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):

☐ race _____

☐ color _____

☐ gender/sex _____

☐ religion _____

☐ national origin _____

☐ age (*year of birth*) _____ (*only when asserting
a claim of age
discrimination.*)

☒ disability or perceived disability (*specify disability*)

PTSD, Anxiety, Depression, Whiplash Injury, Cumulative Trauma Disorder

E. The facts of my case are as follows. Attach additional pages if needed.

I, James Lawrence was Harassed by (Jim Hatfield), Corporate
 Manager of Star Protection Agency LLC, where I was harassed
 and then Denied Reasonable Accommodation upon Request!

(*Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.*)

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IV. EXHAUSTION OF FEDERAL ADMINISTRATIVE REMEDIES

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

01/17/2020

B. The Equal Employment Opportunity Commission *(check one)*:

- ☐ has not issued a Notice of Right to Sue letter.
☒ issued a Notice of Right to Sue letter, which I received on *(date)*

02/19/2021

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

- ☐ 60 days or more have elapsed.
☐ less than 60 days have elapsed.

V. RELIEF

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

**Plaintiff Requests the Court Order the Judgment of
 \$300,000, (EEOC Limit Remedy for Employment
 Discrimination), Whereas Employer is within Limits!**

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VI. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

03/05/2021

Signature of Plaintiff



Printed Name of Plaintiff

James A. Lawrence Jr.

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff